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16 July 2020

VIA ECF

Honorable Nelson Stephen Roman The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse 300 Quarropas Street White Plains, New York 10601

Perkins v. United States Department Of The Treasury et al.

Case No.: 7:18-cv-08911-NSR-PED

Our File No. 20851.001

Dear Judge Roman:

We represent the plaintiff, Kimberly Perkins, in the above-referenced action. We write to respectfully request an adjournment of the July 17, 2020 Conference before Your Honor. This request is made with the consent of defense counsel.

The adjournment is requested because the parties have not had the opportunity to conclude conducting depositions. The current Deadline for fact discovery is July 28. 2020. There have been scheduling conflicts (that the parties have made, and will be making a good faith effort to resolve); and Plaintiff's office has been closed due to the COVID-19 restrictions making it difficult and, in certain instances, impossible to retrieve hard-copy files; and this law firm has had to furlough two (2) senior litigators, including the lead counsel on this case.

Respectfully submitted,

s/Marshall Bellovin Marshall B. Bellovin, Esq. (MB 5508) Member of the Firm Counsel for Plaintiff

Natasha W. Teleanu, Esq. (via ECF) -Counsel for Defendant(s)

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Pltf's request to adjourn the Status Conf. from July 17, 2020 until Sept. 16, 2020 at 12:00 pm is granted. Clerk of the Court requested to terminate the motion (doc. 75).

Dated: July 16, 2020

SO ORDERED.

Nelson S. Román, U.S.D.J.